

REMARKS

The Final Office Action dated May 19, 2005 contained a final rejection of claims 1-20. The Applicant has amended claims 1, 2, 11, and 18. Claims 1-20 are in the case. Please consider the present amendment with the attached Request for Continued Examination (RCE) under 37 C.F.R. § 1.114. This amendment is in accordance with 37 C.F.R. § 1.114. Reexamination and reconsideration of the application, as amended, are requested.

The Final Office Action rejected claims 1-12 and 14-17 under 35 U.S.C. § 102(e) as being anticipated by Askren et al. (U.S. Patent No. 6,350,004). Also, the Final Office Action rejected claims 13 under 35 U.S.C. § 103(a) as being unpatentable over Askren et al. in view of Fujita et al. (U.S. Patent No. 6,733,100). Last, the Final Office Action rejected claims 18-20 under 35 U.S.C. § 103(a) as being unpatentable over Askren et al. in view of Fujita et al.

The Applicant respectfully traverses these rejections based on the amendments to the claims and the arguments below.

The Applicant's invention includes an ink ejection driver head having a distributive processor integrated within the ink ejection driver head and a correction scheme programmed into the distributive processor, wherein the correction scheme includes intentionally misaligning the ejected ink drops to compensate for defective drops of ink that are ejected when the driver head fires above a threshold frequency.

With regard to the rejections under U.S.C. 102, the Applicants respectfully submit that Askren et al. do not disclose, teach, or suggest all of the claimed features. For example, Askren et al. merely disclose a "...method and system for compensating for swath skew with respect to a perpendicular direction of carrier travel..." (see Abstract of Askren et al.). In other words, Askren et al. discloses a method for correcting **mechanical misalignment errors** (stitching), and **not** correcting errors caused by defective drops of ink that are ejected when the driver head fires above a threshold frequency, like the Applicants' claimed invention. Therefore, since all of the claimed elements are not disclosed by Askren et al., it cannot anticipate the claims, and hence, the Applicants submit that the rejection should be withdrawn.

With regard to the rejections under U.S.C. 103(a) of the rest of the claims, as argued above, the Applicants submit that Askren et al. et al., alone or in combination with Fujita et al. do not disclose, teach, or suggest the Applicant's correction scheme programmed into the distributive processor for intentionally misaligning the ejected ink drops to compensate for defective drops of ink that are ejected when the driver head fires above a threshold frequency.

Although Fujita et al. disclose determining alignment offsets and Askren et al. disclose correcting printing errors, Askren et al. is explicitly limited to correcting **mechanical problems** of a printer associated with "stitching." Namely, Fujita et al. in combination with Askren do not disclose, teach, or suggest correcting printing errors caused by defective drops which occur when the driver head fires above a threshold frequency, like the Applicants' claimed invention.

For instance, Askren et al. explicitly states that "[S]titching occurs because of misalignment, or skew, of the nozzle plate with respect to the perpendicular direction of carrier travel, due to, for example, the common stack-up of **mechanical tolerances** in the various components of an ink jet printer, **misalignment of the carrier guide rod** with respect to the direction of paper travel, **mechanical tolerances of the print nozzle itself**, and the inherent difficulty of maintaining a precise alignment of a replaceable cartridge with respect to the carrier." [emphasis added] (see col. 1, lines 31-39 and FIG. 4 of Askren et al.). Clearly, this is very different from the Applicants' correction scheme that intentionally misaligns the ejected ink drops to compensate for defective drops of ink that are ejected when the driver head fires above a threshold frequency.

Therefore, since the claimed elements are not disclosed, taught or suggested by Askren et al. alone or in combination with Fujita et al., the combined references cannot be used to render the claims obvious, which indicates a clear lack of a prima facie case of obviousness (*MPEP* 2143).

Further, with regard to the rejection of the dependent claims, because they depend from the above-argued respective independent claims, and they contain additional limitations that are patentably distinguishable over the cited references, these claims are also considered to be patentable (*MPEP* § 2143.03).

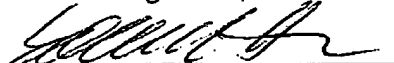
Thus, it is respectfully requested that all of the claims be allowed based on the amendments and arguments. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue.

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Applicants kindly invite the Examiner to telephone the Applicants' attorney at (818) 885-1575 if the Examiner has any questions or concerns. Please note that all correspondence should continue to be directed to:

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Respectfully submitted,
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